

EXHIBIT Q

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April 19, 2024

HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY

Via Email

Emily Bolles, Esq.
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20590
ebolles@ftc.gov

Re: FTC v. Amazon.com, Inc., Case No. 2:23-cv-01495-JHC (W.D. Wash.)

Dear Emily:

I write to follow up on our April 15, 2024 meet and confer and your April 16, 2024 letter ("Pltfs. Ltr.") regarding Amazon's December 14, 2023 Responses and Objections ("Objections") to the Plaintiffs' First Set of Requests for Production ("Requests") for Request Nos. 6, 8, 25, and 27. We disagree that the parties are at an impasse as to Request Nos. 6 and 8, including because the parties had not yet completed meeting and conferring on aspects of these Requests prior to Plaintiffs' April 15 meet and confer.

Request No. 6

[REDACTED]

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Request No. 8



Request Nos. 25 and 27

As documented in Amazon's previous letters on this issue, Amazon will not voluntarily produce documents sought by Request Nos. 25 and 27 that are protected by the attorney-client privilege and/or work product doctrine. However, as documented in previous letters and as stated during our April 15 meet and confer, Amazon is willing to produce non-privileged documents, and redacted versions of partially privileged documents, responsive to Request No. 27 under the parameters of our April 5 letter to you. During the meet and confer, you expressed a preference to resolve the privilege issue before revisiting our negotiations on the scope of a production under Request No. 27.

Sincerely,

Connie Forkner

Constance T. Forkner

cc: Susan A. Musser, Edward H. Takashima, Daniel A. Principato, Colin M. Herd, FTC
Michael Jo, New York State Office of the Attorney General
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